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February 26, 2004

VIA HAND DELIVERY

Ms. Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 Twelfth Street, SW Washington, DC 20554 RECEIVED

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FEDERAL COMMUNICATIONS COMMISSION

OFFICE OF THE SECRETARY

Re: Notice of Ex Parte Presentation, CG Docket No. 02-386

Dear Ms. Dortch:

On Wednesday February 25, 2004, Michael Fingerhut from Sprint, Michael Del Casino from AT&T and I met with Jessica Rosenworcel, Legal Advisor to Commissioner Copps, to discuss the above-referenced proceeding. The attached presentation, which was provided during the meeting, formed the basis of our discussion.

Pursuant to the Commission's rules, this notice is being provided to you for inclusion in the public record of the above-referenced proceeding.

Sincerely,

Karen Reidy

cc: J. Rosenworcel w/o attachment

Attachment

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Mandatory Minimum CARE Standards

Joint Presentation by AT&T, MCI, and Sprint

CG Docket No. 02-386 February 25, 2004

What is CARE?

- CARE (Customer Account Record Exchange) is the industry standard for the exchange of critical customer information between carriers.
- For example, it is a process used to:
 - submit an end user PIC order;
 - confirm customer orders and transfers;
 - know when a local service provider has placed or removed an end user on the carrier's long distance network;
 - know who the local service provider has suspended or blocked from using the carrier's long distance network; and
 - receive notification of order failure (allowing the carrier to take corrective action and the customer to receive intended service).

Consumers Harmed By No CARE Requirements

- Lack of 100% participation in CARE causes *billing inaccuracies* and consumers believing they have been slammed/crammed.
 - Petitioners estimate that 40% to 60% of consumer billing complaints result from insufficient CARE.
 - For example, the LSP's failure to notify an IXC that it has removed a consumer from the IXC's network results in the consumer continuing to receive bills from that IXC.
- Participation in the CARE process is *not* regulated/mandated.
 - Industry-wide participation does not exist.
 - Inconsistency among carriers causes confusion.
- There is no reliable alternative.

Solution: Mandatory Minimum CARE Standards

- Joint Petition requests that a small, but critical, subset of the current industry standard be mandated for all wireline carriers.
- The proposal includes:
 - Small subset of CARE codes concerning PIC selections, PIC removals, end user disconnects, and essential end user account maintenance activity;
 - Process to ensure timely, accurate, and complete exchange of this data; and
 - Recovery process to remedy incomplete or inaccurate CARE data.

Anticipated Impact: Consumers Benefit

Substantial reduction in consumer complaints.

Anticipated reduction in complaints will be realized only upon 100% participation in mandatory minimum CARE process by all industry participants.

Recommendation

Issue a Notice of Proposed Rulemaking for industry-wide, mandatory minimum CARE standards.